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*Attorney for Jabari L. Marshall*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff;

vs.

JABARI L. MARSHALL,

Defendant.

CASE NO.: 2:10-CR-00236-GMN-PAL

**UNOPPOSED MOTION TO FILE A  
SUPPLEMENT AND PROPOSED  
ORDER  
(Third Request)**

Defendant Jabari Marshall (Marshall), by and through his counsel, Kathleen Bliss, Esq., respectfully requests a two-week extension to June 9, 2020 to file a supplement to Mr. Marshall's motion for compassionate release (ECF No. 526). This request is made based upon the following reasons:

1. Defendant filed pro se an emergency motion for a Sentence Reduction on April 13, 2020 (ECF No. 526).
2. Assistant Federal Defender Monique Kirtley filed a notice of appearance on April 21, 2020 (ECF No. 527).
3. The Federal Defender filed a motion to withdraw on April 21, 2020 (ECF No. 528), which this Court granted on April 22, 2020 (ECF No. 529).
4. This Court appointed undersigned counsel to represent Mr. Marshall on April 22, 2020

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(ECF No. 529).

5. Counsel requested a 14-day extension on April 24, 2020 (ECF No. 530). This Court granted the extension on April 24, 2020 (ECF No. 531).
6. Counsel requested a 14-day extension on May 6, 2020 (ECF No. 532). This Court granted the extension on May 22, 2020 (ECF No. 533). Counsel did not file a status report because there was no change in status on May 22, 2020; that is, nothing to report.
7. Mr. Marshall continues to await medical testing to rule out or to diagnose diabetes. Mr. Marshall wrote to counsel on May 14, 2020, which received on May 18, 2020. The reason for a complete medical evaluation and conclusive test is that Mr. Marshall is prediabetic, as he has a fasting blood sugar level of 112 mg/dL. He also is obese, with a BMI of 40.88, which is at the extreme, Level III of obesity. Both co-morbidity factors create risk for him, but a diagnosis of diabetes would amplify the risk and inform any decision by this Court.
8. Counsel spoke to client telephonically, on May 19, 2020, and confirmed defendant still has not received a complete health evaluation, which defendant needs to determine if he has diabetes since he is obese, and he has family history of diabetes. He is waiting, and counsel requested another update call with client, which has not been scheduled by the facility as of yet.
9. Defendant is incarcerated and does not object to this motion.
10. Counsel for the government does not oppose this motion.
11. This is the third request for extension.

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1 Dated this 26<sup>th</sup> day of May 2020.  
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5 KATHLEEN BLISS LAW PLLC

6 /s/ Kathleen Bliss

7 KATHLEEN BLISS, ESQ.

8 Nevada Bar No. 7606

9 1070 W. Horizon Ridge Pkwy., Suite 202

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**Certificate of Service**

I certify that I am an employee of KATHLEEN BLISS LAW PLLC, and that on this 26<sup>th</sup> day of May 2020, I did cause a true copy of:

**UNOPPOSED MOTION TO FILE A SUPPLEMENT AND PROPOSED ORDER**

to be served via electronic service by the U.S. District Court CM/ECF system to the parties on the Electronic Filing system in this action.

By: /s/Priscilla Horvath  
An employee of  
KATHLEEN BLISS LAW PLLC

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2 **UNITED STATES DISTRICT COURT**  
3 **DISTRICT OF NEVADA**

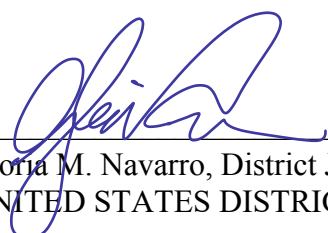
4 UNITED STATES OF AMERICA,  
5  
6 Plaintiff;  
7 vs.  
8 JABARI L. MARSHALL,  
9 Defendant.

CASE NO.: 2:10-CR-00236-GMN-PAL

**ORDER**

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11 Based upon the unopposed motion of Defendant, and for good cause appearing, **IT IS**  
12 **HEREBY ORDERED** that Defendant's unopposed motion, (ECF No. 534), is **GRANTED**.  
13 Defendant shall file a supplement to his motion for compassionate release on or before June 9,  
14 2020.

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17 Dated this 27 day of May, 2020.

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23 Gloria M. Navarro, District Judge  
24 UNITED STATES DISTRICT COURT  
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